



June 28, 2005

Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road; Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 05-015-1

To Whom It May Concern:

Dairy Farmers of America, Inc (DFA) is a milk marketing cooperative representing over 22,000 members that produce milk on more than 17,000 farms in 47 states. In addition to marketing members' milk, DFA, through marketing arrangements with other dairy farmers and/or their marketing organizations, is involved with over one-third of the milk produced nationally.

DFA supports the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services' efforts toward establishing the National Animal Identification System (NAIS), and appreciates the opportunity to comment on the Draft Strategic Plan and Draft Program Standards. DFA commends Secretary Johanns for providing the public with insight and understanding into the implementation timetable and operating components of the NAIS.

DFA, through its membership in and dairy farmer/staff participation on committees and boards of several agricultural organizations most notably National Milk Producers Federation, (NMPF) and National Institute for Animal Agriculture, (NIAA) have been actively involved in the planning and development process that preceded announcement of the NAIS. DFA recognizes the leadership efforts of the two aforementioned groups in the evolution of the NAIS program and supports their comments submitted in response to this request. DFA has also had representation on the Cattle Species Working Group and the Dairy Subgroup in helping to create guidelines to facilitate expeditious and successful implementation of the NAIS.

DFA submits the following comments in response to the specific questions posed by APHIS in this notice.

Corporate Headquarters

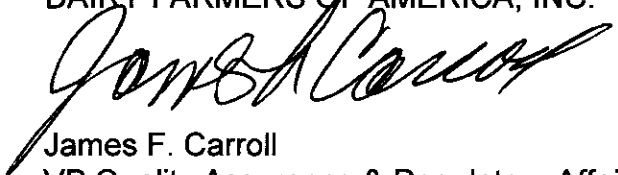
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- NAIS must be implemented at the earliest time possible as a mandatory program.
- Animal owners have primary responsibility to identify all animals leaving their premises and compliance must be ensured on the receiving end.
- If properly regulated, authorized off-farm tagging sites should remain a viable option.
- In a direct sale, the buyer has the responsibility for compliance and reporting however the seller should also be encouraged to report as a cross-check.
- Identification and tagging of animals at birth is most desirable but at a minimum tagging prior to commingling with animals from another premises must be required.
- The current timeline for implementing NAIS should be strictly adhered to.
- All species should be expected to meet the same timelines, however near the end of the process, after all avenues have been exhausted, some flexibility should be allowed.
- Timeliness is first priority in submitting information to the database – multiple methods may be needed initially with a goal of all-electronic in the future.
- All information transferred to the database should be confidential except that required to accomplish 48-hour trace back.
- Privately managed databases may have a place in the overall effort however APHIS must have authority and control over access to the information required to accomplish 48-hour trace back. It seems that privately managed databases could only work if there were rigid guidelines in place for format, access, backup, reliability, etc. . . to the satisfaction of APHIS.

DFA appreciates the opportunity to submit these comments to USDA/APHIS regarding this notice. If we can be of further assistance, please let us know.

Sincerely,

DAIRY FARMERS OF AMERICA, INC.



James F. Carroll
VP Quality Assurance & Regulatory Affairs